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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
PATRICK GEORGE JACKSON,  
  
Defendant.

Case No. 2:20mj351 CMR  
FILED UNDER SEAL  
CRIMINAL COMPLAINT

VIOS. Count I: 18 U.S.C. §  
2252A(a)(5)(B) POSSESSION OF  
CHILD PORNOGRAPHY; Count II: 18  
U.S.C. § 922(g)(1) POSSESSION OF A  
FIREARM BY A RESTRICTED  
PERSON

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Before the Honorable Cecilia M. Romero, United States Magistrate Court Judge  
for the District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT I**

Possession of Child Pornography  
(18 U.S.C. § 2252A(a)(5)(B))

Beginning on a date unknown and continuing until May 12, 2019, in the Central  
Division of the District of Utah,

PATRICK GEORGE JACKSON,

defendant herein, did knowingly possess any material which contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer, and attempted to do so; all in violation of 18 U.S.C. § 2252A(a)(5)(B).

**COUNT II**

Possession of a Firearm by a Restricted Person  
18 U.S.C. § 922(g)(1)

Beginning on a date unknown and continuing until May 12, 2019, in the Central Division of the District of Utah,

PATRICK GEORGE JACKSON,

defendant did herein, knowing he had previously been convicted of a crime punishable by a term exceeding one year, knowingly possessed firearms, to wit: a Norinco semi-automatic 9mm handgun serial number 601105 and ammunition, and the firearms and ammunition were in and affecting commerce; in violation of 18 U.S.C. § 922(g)(1).

**Background of Investigation**

This complaint is made on the basis of an investigation consisting of the following:

I, Jeffrey S. Ross, being duly sworn, hereby deposes and state as follows:

1. Your affiant has been employed as a Special Agent of the FBI since February 28, 1999 and is currently assigned to the Salt Lake City Field Office's Child

Exploitation Task Force. Your affiant has been involved in investigations related to the sexual exploitation of children over the internet since April of 2003. Since joining the FBI, I have investigated violations of federal law, and am currently investigating federal violations concerning child pornography and the sexual exploitation of children. I have gained experience through training in seminars, classes, and everyday work related to conducting these types of investigations. I have been involved in numerous investigations involving sex crimes against children, to include leading investigations related to the sexual exploitation of children over the internet, writing and executing search warrants, conducting undercover operations via the internet, interviewing victims, interviewing suspects and conducting arrests.

### **FACTS AND CIRCUMSTANCES**

2. Based on my knowledge and experience, and on information received from other individuals, including law enforcement officers, as well as their reports, as set forth below, I have learned the following:

3. In July of 1990, Patrick George Jackson was convicted of Sodomy on a Child, a second degree felony in the state of Utah. Jackson was sentenced to a suspended prison sentence and a term of probation.

4. In March of 2002, Patrick George Jackson was convicted of Attempted Forcible Sex Abuse (This offense involved a minor female.), a third degree felony in the state of Utah. Jackson was sentenced to serve time in prison for this offense.



5. On May 11, 2019, a civilian witness who had a relationship with Jackson personally observed at least one sexually explicit video of female children on Jackson's computer. The witness reported that Jackson's computer was playing a video, the witness described the video as depicting a young blond female "about 12-years-old." The female was engaged in sexual acts with herself (digital penetration) and a second female of similar age, without "pants or underwear on," was also depicted. The witness reported this observation to the North Salt Lake Police Department on May 12, 2019. Jackson was a registered sex offender at that time.

6. On May 12, 2019, Jackson was Mirandized and interviewed by law enforcement. During that interview, Jackson admitted to looking for sexually explicit images of children on his cell phone, computer, and digital media. Jackson also admitted to carrying a gun with him and that it was located in his vehicle. Jackson also provided a written statement admitting to the same conduct.

7. Your affiant knows that on May 12, 2019, a search warrant was obtained by the North Salt Lake Police Department to conduct a search of Jackson's residence and vehicle. The search warrant was executed on the same day.

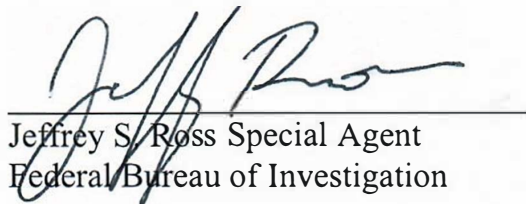
8. Your affiant knows that during the execution of the search warrant, a semi-automatic Norinco 9mm handgun, serial number 601105, was located in a black pouch along with a loaded magazine on the floor of the front passenger area of Jackson's vehicle. Also seized during the execution of the search warrant on Jackson's residence and vehicle were several items of digital media.

9. Your affiant knows that on May 15, 2019, an additional search warrant was obtained by Det. Peirce of the Davis County Sheriff's Office to conduct a search of the items of digital media seized from Jackson's vehicle and residence.

10. During a forensic examination of the items of digital media which was conducted at the Regional Computer Forensics Lab, several hundred sexually explicit images of minor females, some appearing to be toddler aged, including depictions of sadistic sexual abuse, were located on the digital media seized from Jackson. Law enforcement officers assisting in the search of digital media also located sexually explicit images of children on the writable discs seized from Jackson.

11. Based on these facts, your affiant respectfully submits that there is probable cause to believe that Patrick Jackson has committed violations of 18 U.S.C. § 2252A(a)(5)(B), Possession of Child Pornography; and 18 U.S.C. § 922(g)(1), Possession of a Firearm by a Restricted Person.

Based on the foregoing information, your affiant respectfully requests that a warrant of arrest be issued for Patrick Jackson.

  
Jeffrey S. Ross Special Agent  
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me this \_\_7th\_\_ day of \_\_May 2020

  
Cecilia M. Romero  
UNITED STATES MAGISTRATE JUDGE

JOHN W. HUBER  
United States Attorney

**KARIN FOJTIK**

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KARIN FOJTIK  
Assistant United States Attorney